

Atlantic Packaging Ltd.
Paper Fibre Biosolids:
Regulation 347 Waste Classification

Ministry of the Environment

January 2004

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Atlantic Packaging Ltd. Paper Fibre Biosolids: Regulation 347 Waste Classification

Introduction

Atlantic Packaging Ltd. is a paper recycling company. Wastewater produced at the plant during the paper-making process contains suspended solids consisting of clay and short paper fibres. Subsequent de-watering leaves a paper fibre biosolid waste, which is used by Courtice Auto Wreckers Ltd. to produce a material called Sound-Sorb. Sound-Sorb is produced by mixing the paper fibre waste with mineral soil. Sound-Sorb is currently being used to construct sound and bullet attenuation berms at gun clubs in Ontario. Once the paper fibre waste has been used to produce Sound-Sorb, it is no longer subject to the Ministry of the Environment's waste management regulations and the *Environmental Protection Act*. The ministry's waste management regulation, Regulation 347, contains a provision that exempts wastes that are transferred directly to a site, wholly used in a process for purposes other than waste management, and then offered for retail sale.

The public has expressed concern that berms built of Sound-Sorb will adversely affect human and environmental health. In response, the ministry tested the Atlantic Packaging paper fibre biosolids and the Sound-Sorb material for over 90 different elements and compounds. A report describing the results of this testing was completed in June, 2002. With the exception of total petroleum hydrocarbons (TPH), toluene, free cyanide and chloride, all parameters measured were present in concentrations lower than those found in soils in Ontario which have not been subject to contamination by commercial or industrial activity (Table F. *Guideline for Use at Contaminated Sites in Ontario*). Only TPH was found in the berm at a level which would prompt remedial action if the soil on the site contained a similar TPH concentration and the site were to be redeveloped. The risks to human and environmental health associated with the TPH levels in the berm are currently being addressed in a Site Specific Risk Assessment (SSRA). In addition to the SSRA, other work currently under way to address recommendations made in the June, 2002 report, include well monitoring and further testing of the Sound-Sorb material. A study that assessed the potential for the berm to generate aerosols containing harmful bacterial and fungal spores has recently been completed and a panel of scientific experts to review all existing and new scientific information has been established.

Concerned citizens also asked the ministry if the paper fibre waste used to produce Sound-Sorb would be considered as a hazardous waste under our waste management regulations. Regulation 347 provides the process and structure under which waste is classified as either hazardous or non-hazardous. The Toxicity Characteristic Leaching Procedure is one measure used to determine if waste is hazardous. The procedure involves mixing the waste material with a prescribed solution for a prescribed length of time to determine if there are measurable contaminants. This procedure is outlined in Regulation 347. It is designed to represent the contaminant concentrations that might be expected through prolonged leaching of a material under natural environmental conditions.

In order to classify the waste used in the making of Sound-Sorb, the ministry performed the

Toxicity Characteristic Leaching Procedure prescribed in Regulation 347, on paper fibre biosolid waste produced by the Whitby and Scarborough plants of Atlantic Packaging Ltd. This report discusses the results obtained from the leach test.

Sampling and Analysis

The Toxicity Characteristic Leaching Procedure prescribed in Regulation 347 is the process used to characterize waste for the purpose of classifying it for disposal. The procedure involves leaching a sample of the waste with acetic acid and measuring the concentrations of a large number of contaminants. The result for each contaminant is compared to the concentration listed for that contaminant in Schedule 4, Regulation 347 of the *Environmental Protection Act*. If the concentration equals or exceeds the prescribed concentration listed in Schedule 4, the waste is considered to be a "leachate-toxic waste". Disposal of leachate-toxic wastes must occur at an approved facility in accordance with the generator registration and manifesting requirements of Regulation 347. If the concentrations for all contaminants are lower than those listed in Regulation 347, the waste is characterized as non-hazardous waste and the waste is not subject to generator registration and/or manifesting requirements.

Results and Conclusions

Attached are the results as compared to Schedule 4 of Regulation 347. Regulation 347, Schedule 4 consists of a total of 88 parameters, including Benzene, Benzo(a)pyrene, Cadmium, Dioxins/Furans and Vinyl Chloride. There were no exceedances of any of the Schedule 4 parameters in either the Whitby or Scarborough plant biosolids. The results presented indicate that the paper fibre biosolid waste produced by Atlantic Packaging Ltd. is not a "leachate-toxic waste" and, therefore, not a hazardous waste.

References

Ontario Ministry of Environment and Energy, (2002). **Atlantic Packaging Ltd. Paper Fibre Biosolids and Sound-Sorb Berm, Oshawa Skeet and Gun Club: Results of Chemical and Microbiological Testing**. Central Region, June 2002.

Ontario Ministry of Environment and Energy, (1997). **Guideline for Use at Contaminated Sites in Ontario (Revised, Feb.1997)**, Queen's Printer, Ontario.

Ontario Environmental Protection Act, Ontario Regulation 347

Chemical and Microbiological Test Results of Sound-Sorb Berms at the Madoc and District Anglers and Hunters Site, Madoc, Ontario

Ministry of the Environment

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CHEMICAL AND MICROBIOLOGICAL TEST RESULTS OF SOUND-SORB BERMS AT THE MADOC AND DISTRICT ANGLERS AND HUNTERS SITE, MADOC, ONTARIO

Introduction

Atlantic Packaging Ltd. is a paper recycling company. Wastewater produced at the plant during the paper-making process contains suspended solids consisting of clay and short paper fibres. Subsequent de-watering leaves a paper fibre biosolid waste, which is used by Courtice Auto Wreckers Ltd. to produce a material called Sound-Sorb. Sound-Sorb is produced by mixing the paper fibre waste with mineral soil. Sound-Sorb is currently being used to construct sound and bullet attenuation berms at gun clubs in Ontario.

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To supplement the testing of the berm at the Oshawa Skeet and Gun Club, and to look at how the chemical composition of Sound-Sorb berms varies across the province, berms at other locations were also tested. The Ministry of the Environment (MOE) reported test results for the berm at the East Elgin Sportsman's Association in early 2003. In the summer of 2003, the Madoc and District Anglers and Hunters (MDAH) site and the Orillia Gun Club were selected and sampled. This report summarizes the test results for the Madoc District and Anglers Club.

Sample Collection and Analysis

On August 13, 2003, MOE York-Durham District Office staff sampled two Sound-Sorb berms at the Madoc and District Anglers and Hunters near Madoc, Ontario. The two berms sampled have been in place since early 2001. Core samples were taken from each berm using an AMS extendible soil core sampler with 40 cm length polycarbonate tube inserts. The insert allowed removal of an intact section which was sectioned and transferred to laboratory containers and submitted to the ministry's Laboratory Services Branch for analysis. Samples were collected from the top (0-60 cm) and the bottom (60-120 cm) and then composited for analysis.

The samples from the MDAH were tested for similar chemical elements and compounds as were

measured in the fresh paper fibre biosolids and the Sound-Sorb berm located at the Oshawa Skeet and Gun Club. A description of each of these parameters is outlined in the MOE June 2002 report, *Atlantic Packaging Ltd. Paper Fibre Biosolids and Sound-Sorb Berm, Oshawa Skeet and Gun Club: Results of Chemical and Microbiological Testing*. The samples were also tested for chlorophenol compounds at the request of concerned citizens.

Use of Guideline Data for Comparison

The contaminant concentrations listed in two tables from the *Guideline for Use at Contaminated Sites in Ontario (1997)* were used for comparison with the results. Table F lists the upper range of contaminant concentrations found naturally in soils (0 - 5 cm depth) in Ontario, from areas that have not been subjected to contamination from commercial or industrial activity.

Table A lists the upper limit concentrations of contaminants in soil that would prompt remedial action if the land were to be redeveloped for recreational/residential purposes, in an area where the groundwater is used for human consumption. Table A concentrations have been developed to provide protection against the potential for adverse effects to human health, ecological health and the natural environment. (Ontario Ministry of Environment and Energy, 1997). The intended use of these guidelines is for measuring soil contamination by a foreign material deposited on the site. The guidelines are not routinely used for comparison with the chemical concentrations of the foreign material itself. For this reason, the comparisons made in this report are for information purposes only. If contaminant levels in the berm exceed the criteria in these tables, the environmental and human health risk associated with these contaminants will be assessed.

Discussion of Analytical Results

Results of the analyses are presented in Tables 1, 2 and 3 attached. Table 4 presents the inorganic chemistry data for the Sound-Sorb berm at MDAH as it compares to data collected from the Sound-Sorb berms at the Oshawa Skeet and Gun Club (Oshawa, Ontario) and the East Elgin Sportsman's Association (Alymer, Ontario).

E. coli (fecal indicator) bacteria were not detected in the MDAH berm cores. These findings are similar to those at the Oshawa Skeet and Gun Club, the East Elgin Sportsman's Association and the Orillia Gun Club sites. Coliform bacteria, the group of bacteria into which *E. coli* falls, are naturally present in large amounts in surface soils and are also present in large amounts in fresh paper fibre biosolids (Ontario Ministry of the Environment and Energy, 2002). The fact that *E. coli* were not detected in the berm samples, or were present at trace amounts in some berms, suggest that they die off rapidly after berm construction. In the June 2002 report it was suggested that this may be a result of nitrogen deficiency and the heat generated through composting processes occurring in the berm.

The inorganic chemistry data from the MDAH berms are similar to those found in the Oshawa Skeet and Gun Club berms (see June 2002 report) and the East Elgin Sportsman's Association berms (see January 2003 report). With the exception of copper, the inorganic chemistry data samples from the MDAH berm cores are below the typical range of uncontaminated Ontario

soils (Table F, of the MOE *Guideline for Use at Contaminated Sites in Ontario, February 1997*). The copper levels, although higher than the typical range of uncontaminated soil, were below the guideline level for soil that would prompt remedial action when redeveloping the site (Table A, *Guideline for Use at Contaminated Sites in Ontario, February 1997*).

Table F, of the *Guideline for Use at Contaminated Sites in Ontario*, does not include limits for elements such as aluminum, calcium, magnesium, sodium, potassium, iron, and others. These elements form the basic building blocks of soil minerals and are present in varying amounts in soils. As such, they are not considered contaminants. However, as part of the soil survey conducted during the preparation of MOE's *Guideline for Use at Contaminated Sites in Ontario*, these elements were measured. The upper limit concentration of each of these elements found in uncontaminated Ontario soils is shown in the attached table, so that the reader may compare them to the concentration of these elements that were found in Sound-Sorb. Concentrations of these elements in the berms at the MDAH were below upper limit concentrations shown in the attached table. Elements for which this upper limit concentration is used, are flagged in the attached Table 1 by ** in the column labeled Table F. For details on the calculation of the upper limit values, please consult the June 2002 report.

Chlorophenol compounds were not detected in the MDAH berm samples.

As found in other berms tested, the total petroleum hydrocarbons (TPH) in the MDAH berm samples exceeded the Table A concentration of 1100 µg/g (parts per million) (*Guideline for Use at Contaminated Sites in Ontario, February 1997*). The hydrocarbons detected were comprised primarily of compounds in the C10 to C50 range (i.e. compounds having between 10 and 50 carbon atoms). The berms that have been sampled to date are of varying ages. From oldest to newest, the berms list as follows: Orillia Gun Club, Oshawa Skeet and Gun Club, MDAH, East Elgin Sportsman's Association. The TPH levels found at the MDAH were between 7,930 and 9,670 µg/g. These levels are comparable to those found at the East Elgin Sportsman's Association (7,600 - 11,000 µg/g). It is possible that as the berms age, natural bioremediation of the hydrocarbons occurs.

An assessment of the risks posed to human and ecological health by the petroleum hydrocarbons found in Sound-Sorb is being conducted. This assessment will also consider other compounds such as acrylamide monomer and *E. coli*, as these have been raised as a concern by the public. This information will serve as a basis for determining if remedial measures must be implemented for the protection of human health or the environment.

Similar to the results for the East Elgin Sportsman's Association berm samples, volatile hydrocarbons such as toluene and xylenes, were not detected in either of the MDAH berm cores.

The MDAH samples were tested for acrylamide monomer in response to concern from members of the public about its presence as a residual in polyacrylamide which is used as a flocculant in biosolids settling processes at Atlantic Packaging. Acrylamide monomer was not detected in the berm samples. Previous analysis of the fresh paper fibre biosolids taken from Atlantic

Packaging Ltd. (See June 2002 report addendum) detected the presence of 9 µg/g acrylamide monomer. Although guidelines are not available for acrylamide monomer in soil, this low level is not expected to be of environmental or human health concern. As a precaution, however, acrylamide monomer has been included in the human and ecological health site specific risk assessment discussed above.

Polycyclic Aromatic Hydrocarbon (PAH) compound concentrations were below the typical range of uncontaminated soils in Ontario (Table F, *Guideline for Use at Contaminated Sites in Ontario, 1997*). Moreover, all PAH compounds, with the exception of phenanthrene and pyrene, were present either at trace levels or were not detected.

In response to public concern about the amount of mineral material added to the paper fibre in the creation of Sound-Sorb, the ministry used the loss-on-ignition parameter to estimate the mixing efficiency percentage. Loss-on-ignition provides a measure of the combustible material and is used to estimate the amount of organic matter of paper fibre in the material. Using this parameter may confirm that the mixing efficiency of the paper fibre biosolids with sand to produce Sound-Sorb is at an approximate 70:30 ratio. Calculations based on the ministry's knowledge of clay to paper fibre ratios in the paper fibre biosolids (PFB), and the fact that the soil used to produce Sound-Sorb was subsurface mineral soil, suggests that the mixing of paper fibre biosolids and mineral soil occurred in an approximate 70:30 ratio.

Summary and Conclusions

The differences that were found between the berms, in terms of inorganic chemistry, are primarily related to elements such as calcium, aluminum, iron, magnesium, potassium etc. which are mineral-forming elements in soils and as such, are naturally present in soil in varying amounts. Variation between the berms with respect to these elements was therefore expected, given that a different source of mineral soil was used for the construction of each berm.

Organic decomposition processes occur naturally in soil and soil-like materials. Consequently, it was expected that the organic chemical composition of the berm will be reflective of its age. The only organic contaminant present in sufficient quantities to suggest a link between berm age and organic contaminant concentration is TPH. Preliminary data indicate the amount of TPH may be reduced over time through microbial decomposition of the hydrocarbons. Further information on TPH will be provided through the Site Specific Risk Assessment.

Based on the findings at the MDAH site and results reported for the Orillia Gun Club, the East Elgin Sportsman's Association berms and the Oshawa Skeet and Gun Club, all the Sound-Sorb berms sampled are of similar chemical composition. With the exception of TPH, all parameters measured in the MDAH berm were present in concentrations lower than those found in soils in Ontario which have not been contaminated by commercial or industrial activity (Table F. *Guideline for Use at Contaminated Sites in Ontario*). The risks to human and environmental health associated with the TPH levels in Sound-Sorb are currently being addressed in a Site Specific Risk Assessment (SSRA) at the Oshawa Skeet and Gun Club. The results of the SSRA,

as well as the results presented in this report, form part of the large body of scientific information which is currently being collected related to Sound-Sorb berms in Ontario. The information will aid the ministry in deciding whether or not there is a need to manage the use of Sound-Sorb within the province.

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